FINAL

DECISION DOCUMENT FOR

INTERIM REMEDIAL ACTION AT RSA-13, OPEN BURN/OPEN DETONATION AREA, REDSTONE ARSENAL

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U.S. ARMY CORPS OF ENGINEERS SAVANNAH DISTRICT

ABBREVIATIONS AND ACRONYMS

ADEM Alabama Department of Environmental Management

AR Army Regulation

BNA Base/Neutral/Acid Extractables

CERCLA Comprehensive Environmental Response and

Compensation Liability Act

CRP Community Relations Program

DA Department of the Army
DOD Department of Defense

FFA Federal Facilities Agreement

EPA US Environmental Protection Agency
HEA Health and Environmental Assessment

ICM Interim Corrective Measure
IRA Interim Remedial Action
MICOM U.S. Army Missile Command

NCP National Contingency Plan (National Oil and Hazardous

Substances Pollution Contingency Plan)

NOV Notice of Violation

OB/OD Open Burn/Open Detonation

PIRP Public Involvement and Response Plan RCRA Resource Conservation and Recovery Act

RSA Redstone Arsenal

RFI RCRA Facility Investigation

SARA Superfund Amendments and Reauthorization Act

TCE Trichloroethylene or Trichloroethene

TRC Technical Review Committe
TSS Total Suspended Solids

TVA Tennessee Valley Authority

UV Ultraviolet

VOC Volatile Organic Compound

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PURPOSE OF INTERIM REMEDIAL ACTION

This decision document describes the selected interim remedial action for RSA-13, Open Burn/Open Detonation (OB/OD) Area, (see Figure 1-3), at Redstone Arsenal developed in accordance with the CERCLA as amended by SARA, the NCP, RCRA, and AR 200-1, as applicable. RSA-13, Unit 2, is approximately 89 acres in size and is located in the southern part of Redstone Arsenal near the Tennessee River.

The OB/OD areas are used to dispose and decontaminate explosives and explosive-contaminated materials and to dispose of reactive wastes by thermal treatment. The reactive wastes include bulk propellants, propellant-contaminated solvents, and nonhazardous propellant-contaminated waste such as rags and wood containing 4% or less propellant. Prior to January 1986, solvents and solvent-contaminated materials were routinely incinerated directly on the ground at two open burn pads of the Open Burn Area in the northern portion of RSA-13.

In January 1986, Redstone Arsenal received a Notice of Violation (NOV) from the Alabama Department of Environmental Management (ADEM) following an inspection in June 1985 of the Unit 2, RSA-13, burning area. During the inspection, ADEM observed that solvent burning on unprotected ground was being conducted at Unit 2, RSA-13. As a result, ADEM recommended the installation of groundwater quality monitor wells in the overburden and bedrock at the site to determine whether subsurface contamination may have occurred, and if so, to what extent.

In response to the NOV, Redstone Arsenal conducted a RCRA Facility Investigation (RFI), in two phases, to assess site subsurface conditions and to determine what impacts, if any, the prior site activities may have had. Volatile organic compounds (VOCs), base/neutral/acid extractables (BNAs), and metals were detected at varying concentrations, some above regulatory action levels, in soils and groundwater underlying the site. The bulk of solvent contamination is Trichloroethylene (TCE). Figure 2-1 shows the TCE contamination contours in the Upper Bedrock as generated based on RFI data.

A Health and Environmental Assessment (HEA) was performed in conjunction with the RFI activities. The purpose of the HEA is to determine possible human and environmental exposure routes so as to assess potential contaminant routes of migration. During the conduct of the HEA, VOC's and BNAs and explosives, to a lesser degree, were found to be present at concentrations exceeding systemic and/or carcinogenic criteria. The carcinogenic criteria were exceeded by a factor ranging from 1.75 to 971. However, based on the exposure pathway analysis, it was determined that the probability of exposure to contaminants by either hunters or RSA personnel was low. As result of the NOV received from ADEM and the contaminant levels encountered during the RFI, Interim Corrective Measures (ICMs), as outlined herein, have been designed and are planned for the site.

This decision document was developed by the MICOM Environmental Office, Redstone Arsenal, with support from the U.S.Army Corps of Engineers. The selection remedy outlined herein has concurrence from the United States Environmental Protection Agency (EPA) and Alabama Department of Environmental Management (ADEM).

SUMMARY OF SITE RISK

Health and Environmental Assessment (HEA) were performed during Phases I & II of the RCRA Facility Investigation at RSA-13, OB/OD Area. The HEA was done to determine the possible human and environmental exposure routes; to identify and evaluate the potential contaminant routes of migration.

SUMMARY OF REMEDIAL ALTERNATIVES

The Interim Corrective Measure (ICM) for RSA-13 consists of a distribution network of a maximum of eighteen (18) extraction wells screened into both the upper limestone and the coarse grain alluvium that appears at some locations above the limestone, see Plate C-2. All piping, cable, and control wires are buried below grade. The potential for ejected debris from open detonation precludes the use of surface-run pipe and cable systems.

The ICM design includes the requirement for use of Advanced UV Oxidation to destroy the contaminant(s). Analysis of site groundwater indicates the need for a pretreatment system in order for UV Oxidation to be fully effective. The design allows for pretreatment system for iron oxidation and TSS removal as well as sludge dewatering. The iron oxidation will be carried out by hydrogen peroxide addition. The iron and TSS removal will be accomplished by addition of polymer, flocculation, settling and filtration. Sludge dewatering will be achieved by filtering through automatic backwashing bag filters.

The treated effluent will flow through a six inch PVC pipe and discharge through an outfall into a small stream draining westward into Wheeler Lake and the Tennessee River.

The options considered for treatment of the groundwater to remove chlorinated organic compounds were: air stripping, granular activated carbon, advanced oxidation processes, and biological treatment. An economic evaluation was performed to establish the most cost effective treatment system based on a full service contract provided by the contractor over the anticipated life of the treatment program. The treatment option evaluated were:

Option 1: Advanced Oxidation Process

Option 2: Liquid Phase Carbon Adsorption Process

Option 3: Air Stripping

Option 4: Air Stripping with Liquid Phase Carbon Adsorption

Option 5: Air Stripping with Catalytic Oxidation in the Vapor Phase

Option 6: Air Stripping with Vapor and Liquid Phase Carbon Adsorption

TREATMENT OPTIONS

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Set-Up	\$5 ,	,500	\$	75,000	\$3	0,000	\$5	4,000	\$1	05,000	\$1	05,000
Monthly Service	\$7,	,800	\$	5,500	\$	3,500	\$	4,900	\$	10,000	\$	9,000
Monthly Power	\$3,	,582	\$	150	\$	400	\$	470	\$	1,100	\$	600
Annual Cost Carbon	\$	0	\$3	348,000	\$	0	\$	3,400	\$	0		88,000
Purchase Air Stripping	\$	0	\$	0	\$5	5,000	\$:	55,000		55,000		55,000
Purchase Incinerator	\$	0	\$	0	\$	0	\$	0	\$1	150,000	\$	0
Annual Cost	\$139,350		\$453,300		\$8	39,300	\$1	22,340	\$2	288,200	\$2	283,200

Option 1 was selected for implementation because of low cost and several technical advantages over the other options. The technical advantages are:

- * Permitting of the effluent is less time intensive and expensive.
- * Process is least sensitive to changes in contaminant loading
- * Maintenance costs are expected to be the lowest.
- * Air dispersion modeling not required by this option.

One of the key considerations of the advanced UV process and a primary reason for its selection is that numerous types of contaminants can be readily destroyed through photooxidation to carbon dioxide, water, and inorganic salts.

PUBLIC/COMMUNITY INVOLVEMENT

It is the policy of the Department of Defense (DOD) and the Department of the Army (DA) to involve the general public including the local community as early as possible and throughout the installation restoration process at an installation. To accomplish this, a Community Relations Plan (CRP) was developed at Redstone Arsenal with input from residents and officials from the local communities. The CRP document is the guidance document that, under the Federal Facilities Agreement (FFA), will be followed to conduct community relations activities at this installation. As a subplan to the CRP, the site or project specific Public Involvement Response Plan (PIRP) describes the mechanisms in place to provide the public with the information about the specific activities on-going and planned for RSA-13. A Technical Review Committee (TRC), designed to disseminate information to the general public regarding planned or proposed remedial actions for specific sites, has been established in response to CERCLA and NCP requirements. The committee, which meets approximately every three months at RSA, has been kept up-to-date regarding the status of RSA-13 planned activities. In addition, two fact sheets outlining on-going and planned activities at RSA-13 have been prepared and distributed to general public.

DECLARATION

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action, and is cost-effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces the volume of toxic material as a principal element.

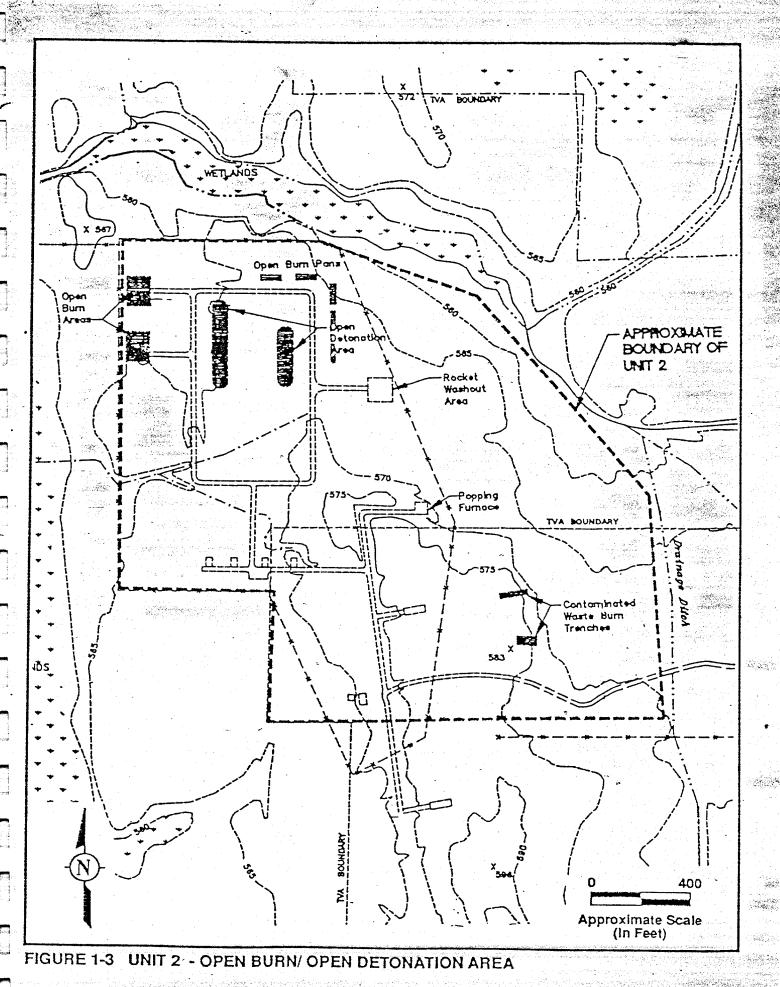
Because this remedy is a source removal and will only address 60% of the groundwater contamination further remedial action will be required to address groundwater and soil contamination. The five-year review will not apply to this interim remedial action. This remedy will be consistent with future remedies needed to address groundwater contamination at this location.

PREPARED UNDER DIRECTION OF:		The second second
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M. Whitt Walker		
Environmental Engineer,		
Environmental Management and Planing		
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H. Sam Fields		i
MICOM Environmental Officer		
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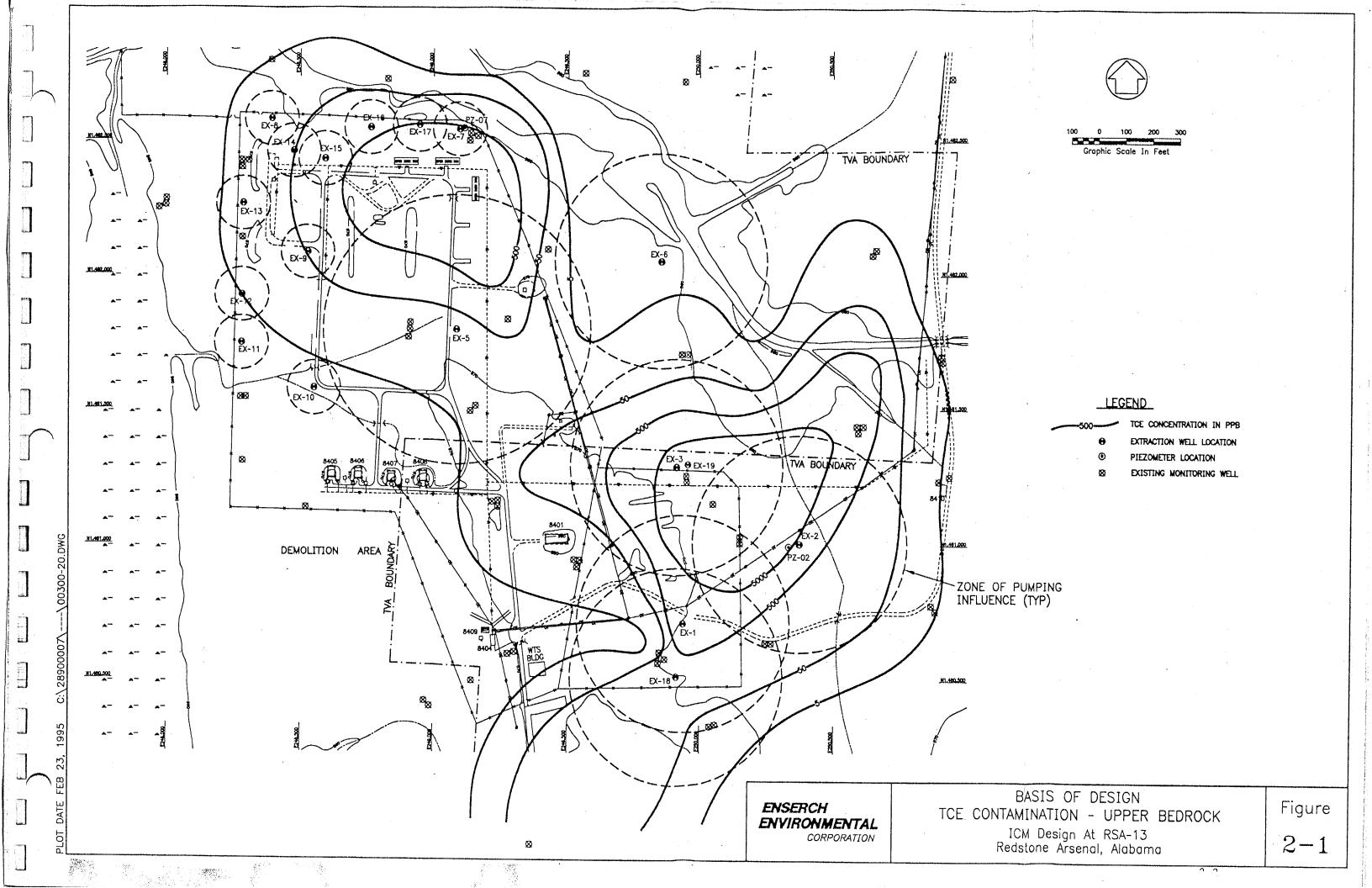
FIGURES

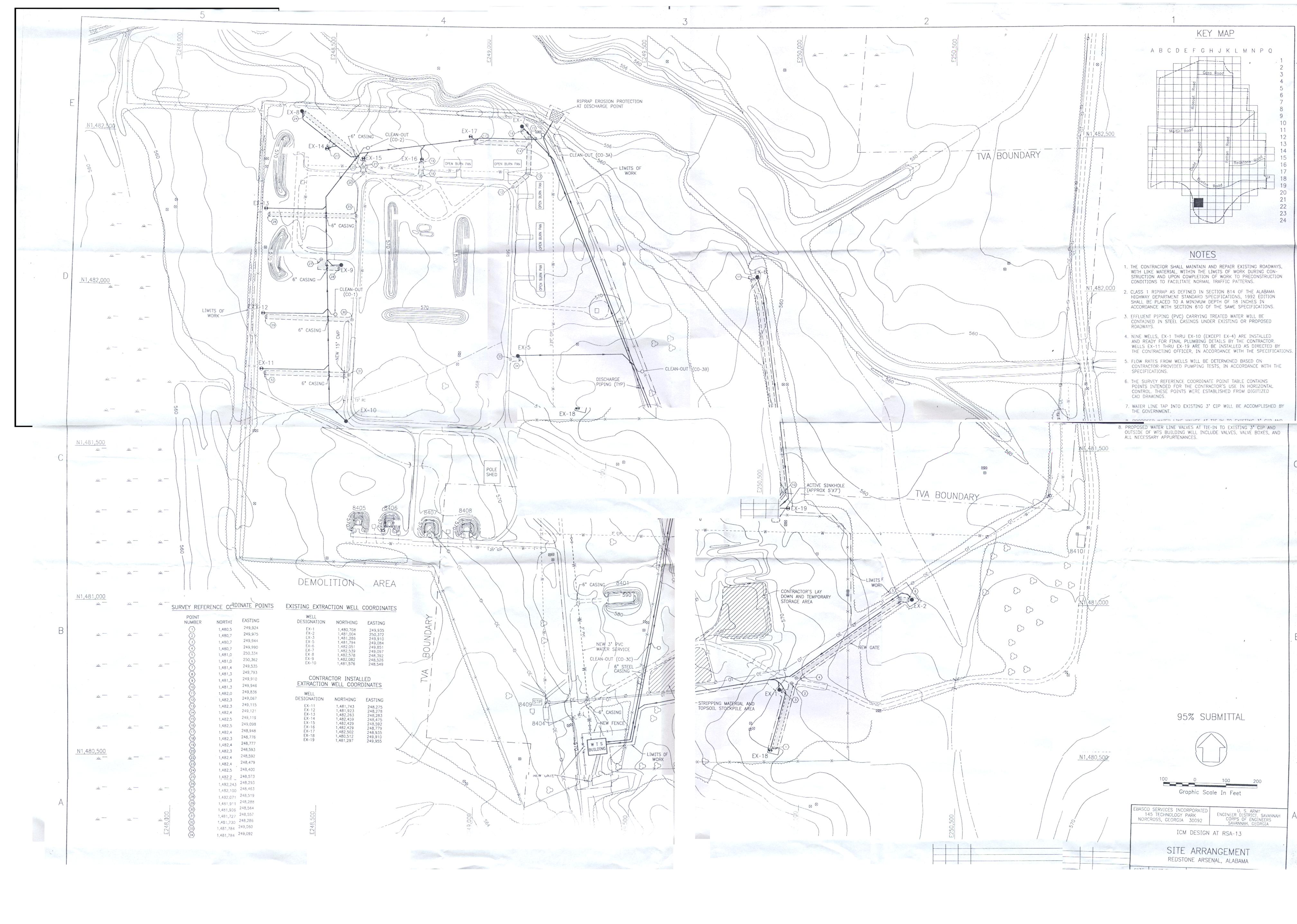
<u>LIST OF FIGURES</u>

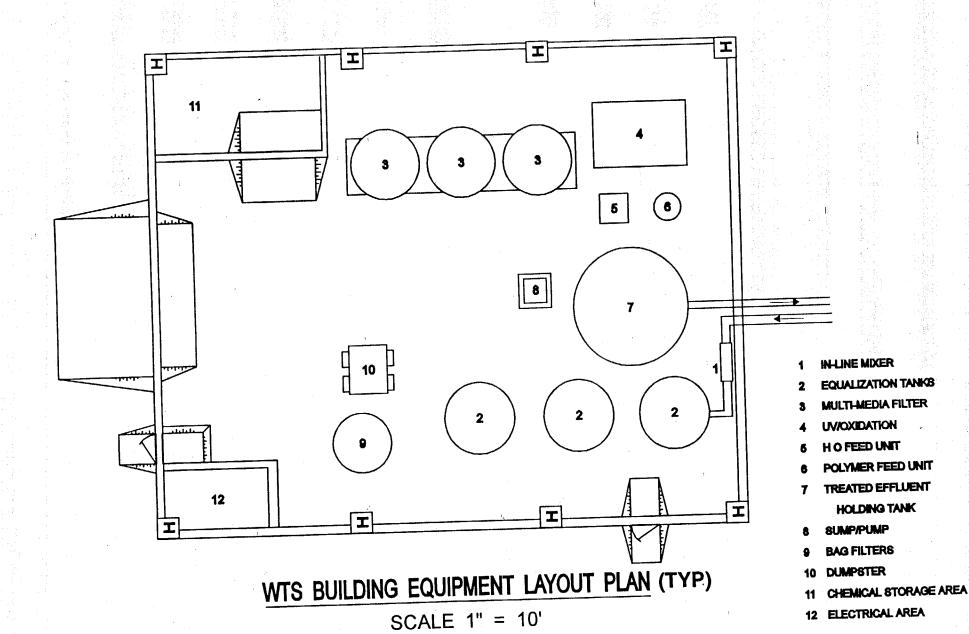
Figure 1-3	RSA-13-Open Burn/Open Detonation Area
Figure 2-1	TCE Contamination-Upper Bedrock
Figure C-2	Site Arrangement Plate
Figure 3-1	WTS Building Equipment Layout Plan



Source: Geraghty and Miller, Inc., 1992







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FIGURE 3-1